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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
1997 Annual Access)
Tariff Filings) CC Docket No. 97-149
)

UNITED STATES TELEPHONE ASSOCIATION
PETITION FOR EXTENSION OF TIME

The United States Telephone Association (USTA) on behalf of its member price cap regulated local exchange carriers (LECs) respectfully request the Commission to extend the filing date for the direct cases set in the above-captioned proceeding until September 2, 1997, for the reasons set out below.¹ USTA is the principal trade association of the local exchange carrier industry. Its membership provides over 94 percent of the local exchange carrier-provided access lines in the United States. The USTA price cap regulated members subject to this investigation are Aliant, Ameritech, Bell Atlantic, BellSouth, Frontier, GTE, NYNEX, SBC, SNET and US West.

On June 27, 1997, the Commission released the *1997 Annual Access Order* which suspended the price cap LECs annual access tariffs for one day, imposed an accounting order and

¹ See *Order Designating Issues for Investigation* (CC Docket No. 97-149), DA 97-1609, (July 28, 1997) (*Memorandum Opinion and Order on Reconsideration*) [hereinafter *Investigation Order*] at ¶ 79.

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initiated an investigation into a number of issues.² On July 28, the Commission released its *Investigation Order* designating for investigation issues regarding common line costs for 15 price cap LECs, equal access exogenous cost changes for 13 LECs and other billing and collection expenses for four LECs, as well as other issues specific to individual LECs.

In this *Investigation Order*, the Commission requires the LECs to file in their direct case historical and recalculated common line Base Factor Portion (BFP) revenue requirements and projections used in the tariff filings for the period 1991 through 1996 on several different basis. More specifically the Commission requires the LECs to file three separate series of revenue requirement calculations for the 1991 through 1996 time period. The first series is to show the actual BFP revenue requirements based on filed ARMIS 40-01 data (*Investigation Order*, ¶17). The second series is to show the effect of specified rules changes as they had been in effect the entire time period (*Investigation Order*, ¶ 22). The third series of calculations is to show the effect of all rules changes as if they had been in effect the entire time period (*Investigation Order*, ¶ 22). The LEC is then required to quantify and explain the significant differences between this data and the projections filed in each of the tariffs periods Tariff Review Plans (TRPs) for the same periods.

The LECs are further required to provide the end user demand in terms of past actual average number of total billable access lines, multi-line business, residential and single-line business lines for the period 1991-1996 and explain the difference between these actual data and the projections filed for the respective tariff years.

² 1997 Annual Access Tariff Filings, National Exchange Carrier Association Universal Service and Lifeline Assistance Rates, Transmittal No. 759 (CC Docket No. 97-149), DA 97-1350, (June 27, 1997)(Memorandum Opinion and Order)[hereinafter 1997 Annual Access Order],

This is an extensive and complex request for data, which is not readily available. The LECs must retrieve a substantial amount of old and, in many cases, archived data and tariff filings and re-familiarize themselves with statistical and computational methods used for the historical tariff years. In addition, the LECs will have to standardize the data to assure consistency, recompute the necessary tariff years data as specified by the *Investigation Order* and then quantify and analyze the significant differences. The data and the calculations must then be reviewed to assure accuracy and, finally, the required analysis performed and explanatory narrations developed. Direct cases for all other issues under investigation must also be developed and filed in the same time frame.

For these reasons, USTA respectfully asks that the Commission to extend the filing date for the LEC direct case required in the *Investigation Order* (Investigation Order, ¶ 79) to September 2, 1997.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

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